

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

ROBERT C. LADUE,

Plaintiff,

v.

LAFRANCE CORPORATION,

Defendant.

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CIVIL ACTION NO. 4-06-CV-00350-RAS



DECLARATION OF RICHARD S. MEYER

I, RICHARD S. MEYER, depose and state as follows:

1. My name is Richard S. Meyer. I am over 21 years of age and have never been convicted of a felony or a crime of moral turpitude. I am of sound mind, and competent in all respects to make this declaration. The facts set forth in this declaration are within my personal knowledge and are true and correct.

2. I have been licensed to practice law in the Commonwealth of Pennsylvania since 1968. I am admitted to practice in the United States Supreme Court, United States District Courts for the Eastern District of Pennsylvania and Eastern District of Michigan and the United States Court of Appeals for the Third Circuit. I have represented clients in cases throughout the country. I am a partner with the law firm of Blank Rome LLP, and I am familiar with the reasonable and customary fees charged in matters of this type.

3. Donald D. Gamburg is an associate with the law firm of Blank Rome LLP. Mr. Gamburg has been licensed to practice law in the Commonwealth of Pennsylvania and State of Ohio since 1996. He is admitted to practice in the United States District Courts for the Eastern District of Pennsylvania, Northern District of Ohio, District of Nebraska, and District of Arizona

and the United States Courts of Appeals for the Third and Sixth Circuits.

4. LaFrance Corporation ("LaFrance"), defendant and counterclaim-plaintiff in the above-styled and numbered matter, engaged Blank Rome LLP to serve as its attorneys and has agreed to pay for legal services rendered in representing LaFrance in this matter. Mr. Gamburg and I have been actively involved in representing LaFrance in this case.

5. In connection with this litigation, LaFrance filed a Motion for Contempt that was granted by the Court on September 5, 2006. I spent 3.0 hours drafting and revising the motion. My hourly rate for this matter is \$575.00. Mr. Gamburg spent 3.1 hours drafting, revising, and researching issues. Mr. Gamburg's hourly rate for this matter is \$335.00. In my opinion, these rates are reasonable and customary for an attorney of Mr. Gamburg's and my levels of experience in a case of this type. The rate is also reasonable given the time and labor required, the novelty and difficulty of the questions involved, the skill required to perform the legal services properly, the likelihood that the acceptance of the particular employment will preclude other employment by Mr. Gamburg and me, the fee customarily charged for similar legal services, the amount involved and the result obtained, the time limitations imposed by the client or by the circumstances, the nature and length of the professional relationship with the client, and Mr. Gamburg's and my experience, reputation, and ability performing the services.

6. Attached as Exhibit "1" is a true and correct summary of the tasks performed on behalf of LaFrance by Blank Rome LLP in connection with this matter, redacted for attorney-client privilege. The summary contains the tasks performed, the attorney who performed the task, the time billed for each task, and the amount charged for each task, which is the time billed times the hourly rate of the attorney.

7. The foregoing statements are made under the penalty of perjury pursuant to 28 U.S.C. § 1746.

A handwritten signature in black ink, appearing to read "Richard S. Meyer", is written over a horizontal line.

RICHARD S. MEYER

Dated: September 11, 2006

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BLANK ROME LLP

Sep 8, 2006 BILL DRAFT PROFORMA AS OF Aug 31, 2006

CLIENT NAME: LaFRANCE CORPORATION
MATTER NAME: VS. ROBERT C. LADUE
(BREACH OF DUTY OF LOYALTY)
MATTER NUMBER: 055112-00238

--MATTER INFORMATION--

SUPERVISING ATTORNEY: [REDACTED]
ASSIGNED ATTORNEY: [REDACTED]
DATE OPENED: Aug 21, 2006
CONTACT NAME: [REDACTED] TELEPHONE: [REDACTED]
DATE OF LAST BILL: [REDACTED]
DATE OF LAST PAYMENT: [REDACTED]

-----TIME AND FEE SUMMARY-----	RATE	HOURS	%	FEE	%
-----TIMEKEEPER-----					
RICHARD S. MEYER	575.00	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
DONALD D. GAMBURG	335.00	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
TOTALS		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

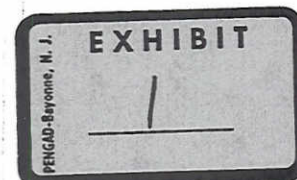
-----COST CODE SUMMARY-----	AMOUNT
-----COST CODE-----	
10 LONG DISTANCE TELEPHONE C	[REDACTED]
15 TELECOPIER/FAX	[REDACTED]
30 REPRODUCTION OF DOCUMENTS	[REDACTED]
42S-X CORPORATE FILINGS:CORPORA	[REDACTED]
TOTAL COSTS	[REDACTED]

LaFRANCE CORPORATION
FILE NUMBER: 055112-00238
INVOICE NO.: *****

Sep 8, 2006

PAGE 2

BLANK ROME LLP
ONE LOGAN SQUARE
PHILADELPHIA, PENNSYLVANIA 19103-6998
(215)569-5500
Page 1



PAGE 6

5.00

██████████; WORK ON CONTEMPT, INCLUDING FIFTH
AMENDMENT RESEARCH (3.0): ██████████

4.60 PREPARE MOTION FOR CONTEMPT (3.1):